

EXHIBIT 13

RBDS	DISPLAY TECHNOLOGIES	PAM	ROTHSCHILD	SAMUEL MEYLER & MEYLER LEGAL PLLC
<p>REQUEST NO. 5: All Documents, Communications, and Things Relating to any proposed or executed License to, assignment of, or any other grant of rights to the '221 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>		<p>REQUEST NO. 7: All Documents, Communications, and Things Relating to any proposed or executed License to, assignment of, or any other grant of rights to the '221 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 5: All Documents, Communications, and Things Relating to any proposed or executed License to, assignment of, or any other grant of rights to the '221 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>	<p>REQUEST NO. 5: All Documents, Communications, and Things Relating to any proposed or executed License to, assignment of, or any other grant of rights to the '221 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendants expressly incorporate each of the foregoing General Objections by reference.</p> <p>Defendants also object to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any</p>

<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as</p>		<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as</p>	<p>other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as</p>	<p>other applicable privilege or immunity.</p> <p>Defendants also object to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.</p> <p>Defendants also object to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendants also object to this Request to the extent it calls for documents not within the possession, custody, or control of Defendants.</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents</p>		<p>premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents</p>	<p>premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents</p>	<p>Defendants also object to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendants will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.</p> <p>Defendants also object to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendants also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>		<p>unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>	<p>party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendants will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in their possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.</p>
	REQUEST NO. 5: All Documents, Communications, and Things Relating to any	REQUEST NO. 8: All Documents, Communications, and Things Relating to any	REQUEST NO. 6: All Documents, Communications, and Things Relating to any	REQUEST NO. 6: All Documents, Communications, and Things Relating to any

	<p>proposed or executed License to, assignment of, or any other grant of rights to the '723 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>proposed or executed License to, assignment of, or any other grant of rights to the '723 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>proposed or executed License to, assignment of, or any other grant of rights to the '723 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendant expressly incorporates each of the foregoing General Objections by reference.</p> <p>Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>	<p>proposed or executed License to, assignment of, or any other grant of rights to the '723 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.</p> <p>RESPONSE:</p> <p>Defendants expressly incorporate each of the foregoing General Objections by reference.</p> <p>Defendants also object to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.</p> <p>Defendants also object to this Request to the extent it is duplicative, cumulative, or otherwise redundant of</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the</p>	<p>other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the</p>	<p>other Requests or other discovery already available to Plaintiff.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.</p> <p>Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the</p>	<p>other Requests or other discovery already available to Plaintiff.</p> <p>Defendants also object to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.</p> <p>Defendants also object to this Request to the extent it calls for documents not within the possession, custody, or control of Defendants.</p> <p>Defendants also object to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendants will provide expert opinions, disclosures, and discovery at the</p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>Court's schedule for this case.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist</p>	<p>Court's schedule for this case.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist</p>	<p>Court's schedule for this case.</p> <p>Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing objections, and to the extent documents exist</p>	<p>time(s) set by the Court's schedule for this case.</p> <p>Defendants also object to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendants also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.</p> <p>Subject to and without waiving the foregoing</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.	and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.	and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.	objections, and to the extent documents exist and have not already been produced to Plaintiff, Defendants will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in their possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------